

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In Re:)	
)	In Proceedings Under
Karl Buckman)	Chapter 7
Debtor,)	
)	BK No.: 16-30266
&)	
Blue Land, LLC,)	
Creditor.)	

MOTION TO AVOID JUDICIAL LIEN

COMES NOW the Debtor, by and through his attorneys, The Law Office of Ronald A. Buch, LLC, and hereby petition that this Court enter an order pursuant to 11 USC Section 522 (f) allowing the Debtor to avoid the fixing of a lien by Blue Land, LLC, on the real estate of the Debtor's and in support of said Petition state:

That based on our information and belief the secured interest claimed by the creditor is a judicial lien and that based on the following information, there is no value to which such lien may attach, after the mortgage and the debtor's homestead exemption. Judgment was entered in Monroe County, case number 14-LM-52 on 8/14/2015.

The date the debt that the lien secures was incurred : on or before 8/14/2015

Blue Lands, LLC (creditor) asserts a lien of	\$37,972.16
Value of the property located at 320 North Library St Waterloo, IL 62298	\$148,000.00
1 st Mortgage on the property	\$130,000.00
Homestead exemption pursuant to 735 ILCS 5/12-901	\$15,000.00
Equity in the property	\$3,000.00
Midland Funding, LLC lien entered 4/27/2015 (2014-SC-00199)	\$2,514.61
Amount of Judicial Lien secured	\$485.39

WHEREFORE, the Debtor prays for the entry of an order reducing the judgment lien to \$485.39 and such further relief as this Court deems equitable.

Karl Buckman,

By: /s/ Ronald A. Buch
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